

EXHIBIT 2

Andrea P Roberts

From: Andrea P Roberts
Sent: Friday, June 02, 2017 10:16 AM
To: Chang, Esther Kim; UberWaymoMoFoAttorneys;
'BSF_EXTERNAL_UberWaymoLit@bsfllp.com'
(BSF_EXTERNAL_UberWaymoLit@bsfllp.com); nchatterjee@goodwinlaw.com;
bschuman@goodwinlaw.com; sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com
Cc: QE-Waymo; John Cooper
Subject: RE: Waymo v. Uber Proposed ESI Order

Esther,

I'm following up to see if Defendants have comments on the proposed Protective Order and ESI Order that we circulated.

Thanks,
Andrea

From: Andrea P Roberts
Sent: Wednesday, May 31, 2017 5:26 PM
To: Chang, Esther Kim <echang@mofo.com>; UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>;
'BSF_EXTERNAL_UberWaymoLit@bsfllp.com' (BSF_EXTERNAL_UberWaymoLit@bsfllp.com)
<BSF_EXTERNAL_UberWaymoLit@bsfllp.com>; nchatterjee@goodwinlaw.com; bschuman@goodwinlaw.com;
sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com
Cc: QE-Waymo <qewaymo@quinnemanuel.com>; John Cooper <JCooper@fbm.com>
Subject: RE: Waymo v. Uber Proposed ESI Order

Esther,

Both the proposed Protective Order and proposed ESI Order are based upon Protective Orders and ESI Orders that Google has used in various litigations and jurisdictions.

We look forward to Defendants' comments on both.

Thanks,
Andrea

From: Chang, Esther Kim [<mailto:echang@mofo.com>]
Sent: Wednesday, May 31, 2017 12:32 AM
To: Andrea P Roberts <andreaproberts@quinnemanuel.com>; UberWaymoMoFoAttorneys
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Cc: QE-Waymo <qewaymo@quinnemanuel.com>; John Cooper <JCooper@fbm.com>
Subject: RE: Waymo v. Uber Proposed ESI Order

Andrea,

Is this based on a model order regarding ESI? If so, would you please identify the model order regarding ESI and send a redline?

Esther

Tel: (415) 268-7562

From: Andrea P Roberts [<mailto:andreaproberts@quinnemanuel.com>]

Sent: Tuesday, May 30, 2017 4:13 PM

To: UberWaymoMoFoAttorneys; 'BSF_EXTERNAL_UberWaymoLit@bsfllp.com'

(BSF_EXTERNAL_UberWaymoLit@bsfllp.com); nchatterjee@goodwinlaw.com; bschuman@goodwinlaw.com; sbrun@goodwinlaw.com; rwalsh@goodwinlaw.com

Cc: QE-Waymo; John Cooper

Subject: Waymo v. Uber Proposed ESI Order

- External Email -

Counsel,

Attached is a proposed ESI Order. This proposed Order is intended to govern discovery of ESI that is outside the scope of that ordered in Paragraph 6 of the May 11, 2017 Preliminary Injunction Order, i.e. "normal discovery." Please let us know if Defendants agree.

Thanks,
Andrea

Andrea Pallios Roberts

Of Counsel,

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